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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,

vs.

JAMAJE BAILEY,
Defendant.

CASE NO: 2:19-cr-301-GMN-DJA

**STIPULATION AND ORDER TO
CONTINUE SENTENCING**

(First Request)

IT IS HEREBY STIPULATED AND AGREED by Jamaje Bailey, by and through his attorney, JAMES A. ORONoz, ESQ., and the United States of America, by and through CHRISTOPHER LIN, ESQ., Assistant United States Attorney, that the video sentencing hearing currently scheduled for January 6, 2021, at 10:00 a.m., be vacated and continued for at least thirty (30) days past the current sentencing date to a date and time that is convenient to this Honorable Court.

The request for a continuance is based upon the following:

1. On December 18, 2020, the Chief Judge of the United States District Court for the District of Nevada extended Temporary General Order 2020-05, which provides limited circumstances in which a sentencing hearing may be conducted via video conference if a case cannot be further delayed. The parties in this case submit that the interests of justice will be best served by continuing the sentencing hearing in this case. At this time, the defense is looking into mitigating circumstances that must be researched prior to the sentencing hearing.
2. Defendant Jamaje Bailey is in custody, and he has no objection to the continuance.

1 3. Defense Counsel for has spoken to AUSA Christopher Lin, and he agrees to the
2 continuanace.

3 4. The additional time requested herein is not sought for purposes of delay.

4 5. The additional time requested by this Stipulation to Continue Sentencing is
5 reasonable pursuant to Fed.R.Crim.P. 32(b)(2), which states that the “court may,
6 for good cause, change any time limits prescribed by this rule.”

7 6. Additionally, denial of this request for continuance could result in a miscarriage
8 of justice.

9 DATED: December 28, 2020

10 Respectfully submitted,

11 /s/ James A. Oronoz

12 James A. Oronoz, Esq.
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14 1050 Indigo Drive, Suite 120
15 Las Vegas, Nevada, 89145
16 Attorney for Jamaje Bailey

17 /s/ Christopher Lin

18 Christopher Lin, Esq.
19 Assistant United States Attorney
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22 Attorney for the United States of America

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UNITED STATES DISTRICT COURT

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**FINDINGS OF FACT, CONCLUSIONS
OF LAW, AND ORDER**

(FIRST REQUEST)

FINDINGS OF FACT

Based on the pending stipulation of Counsel and good cause appearing therefore, the Court finds:

1. On December 18, 2020, the Chief Judge of the United States District Court for the District of Nevada extended Temporary General Order 2020-05, which provides limited circumstances in which a sentencing hearing may be conducted via video conference if a case cannot be further delayed. The parties in this case submit that the interests of justice will be best served by continuing the sentencing hearing in this case. At this time, the defense is looking into mitigating circumstances that must be researched prior to the sentencing hearing.
2. Defendant Jamaje Bailey is in custody, and he has no objection to the continuance.

3. Defense Counsel for has spoken to AUSA Christopher Lin, and he agrees to the continuance.
4. The additional time requested herein is not sought for purposes of delay.
5. The additional time requested by this Stipulation to Continue Sentencing is reasonable pursuant to Fed.R.Crim.P. 32(b)(2), which states that the “court may, for good cause, change any time limits prescribed by this rule.”
6. Additionally, denial of this request for continuance could result in a miscarriage of justice.

CONCLUSION OF LAW

The ends of justice served by granting said continuance outweigh the best interests of the public in proceeding with the sentencing hearing as scheduled, since the failure to grant said continuance would be likely to result in a miscarriage of justice and would deny the defendant the opportunity to appear for his sentencing hearing, taking into account the exercise of due diligence.

ORDER

IT IS THEREFORE ORDERED that the Sentencing date in this matter scheduled for January 6, 2021, be vacated and continued to the 10th day of February, 2021, at the hour of 10:00 a.m. in Courtroom 7D before Judge Gloria M. Navarro.

DATED AND DONE this 29 day of December, 2020.


UNITED STATES DISTRICT JUDGE